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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**

**UNITED STATES OF AMERICA,**

Plaintiff,

vs.

**JAKE RYAN, et al.,**

Defendants.

Case No.: 3:16-CR-00051-BR-26

**DECLARATION OF JESSE  
MERRITHEW IN SUPPORT OF  
DEFENDANT'S MOTION TO  
REVOKE DETENTION ORDER**

I, Jesse Merrithew, make this Declaration under penalty of perjury:

1. I represent the defendant, Jake Ryan, in the above-entitled case.
2. The following materials were delivered to me by Roxsanna Ryan, Jake Ryan's mother:

- a. Attached hereto as Exhibit A are letters of support from various members of the community that Jake Ryan resides in, Plains, Montana;

- b. Attached hereto as Exhibit B is a petition, addressed to the court, and signed by members of the community, requesting Jake Ryan's release and attesting that Jake Ryan does not pose any type of danger to them.
3. Attached hereto as Exhibit C is the CV of Dr. Genevieve Arnaut.
4. On this day, I spoke with Tom Rummel, Sanders County Sheriff. I asked Sheriff Rummel if he still supported Mr. Ryan's release from custody and return to his community and Sheriff Rummel told me that he did. I asked if he would be willing to serve as a local supervisor to Mr. Ryan if the Court ordered it, and he said he would be willing to do so. If the Court orders Mr. Ryan to check in with the sheriff on a daily basis, Sheriff Rummel is happy to assist. Sheriff Rummel further told me that, should Mr. Ryan violate any of the conditions of his release agreement, he would immediately notify the federal authorities and assist in bringing Mr. Ryan into custody if necessary.

**DATED** this 31st day of May, 2016

By: /s/ Jesse Merrithew  
**Jesse Merrithew**, OSB No. 074564  
Attorney for Jake Ryan